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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON GOLDSBY and

KAILI TUALAU,

Defendants.

Case No. 2:16-cr-294-JCM-VCF

**Stipulation to Extend Deadlines
Regarding Defendant Goldsby and
Tualau's Motions (Second Request)
[ECF 258, 259]**

It is hereby stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney, through Richard Anthony Lopez, Assistant United States Attorney, Joshua Tomscheck, Esq., counsel for Defendant Jason Goldsby, and Richard E. Tanasi, Esq., counsel for Defendant Kaili Tualau, that (1) the Government's deadline to respond to Defendants' motions filed at ECF 258 and ECF 259, currently set for November 13, 2020, respectively, be extended to November 16, 2020; and (2) Defendants' deadline to file any reply be extended to November 23, 2020.

This stipulation is entered into for the following reasons:

1 1. On October 13, 2020, Defendant Goldsby filed a motion to suppress (at ECF
2 258). Under Local Criminal Rule 12-1(a)(2), the Government's response to this motion was
3 originally due on or before October 27, 2020.

4 2. On October 14, 2020, Defendant Tualau filed a motion to release grand jury
5 testimony (at ECF 259). Under Local Criminal Rule 12-1(a)(2), the Government's response
6 to this motion was originally due on or before October 28, 2020.

7 3. On October 26, 2020, the parties submitted a stipulation, which the Court
8 granted, extending the deadline to respond to both motions to November 13, 2020.

9 4. The parties request a further, short extension of the briefing schedule so that
10 the Government has adequate time to respond to the motions filed by Defendants Goldsby
11 and Tualau.

12 5. This is the second request for an extension of time regarding the briefing
13 schedule on these motions.

14 6. Because trial is scheduled for February 8, 2021, the granting of this stipulation
15 will not affect the trial date.

16 7. Denial of this request for an extension could result in a miscarriage of justice.

17 DATED this 13th day of November, 2020.

18 Respectfully submitted,

19 NICHOLAS A. TRUTANICH
20 United States Attorney

21 /s/ Joshua Tomsheck, Esq.

22 JOSHUA TOMSHECK, ESQ.
23 Counsel for Defendant GOLDSBY

21 /s/ Richard Anthony Lopez

22 RICHARD ANTHONY LOPEZ
23 Assistant United States Attorney

23 /s/ Richard E. Tanasi, Esq.

24 RICHARD E. TANASI, ESQ.
 Counsel for Defendant TUALAU

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:16-cr-294-JCM-VCF

Plaintiff,

v.

JASON GOLDSBY and

KAILI TUALAU,

Defendants.

[Proposed] Order Granting Stipulation to Extend Deadlines

Regarding Defendant Goldsby and Tualau's Motions

Based on the pending stipulation of the parties, and good cause appearing, the stipulation is hereby GRANTED.

IT IS HEREBY ORDERED that the deadline for the Government's response to Defendant Goldsby and Defendant Tualau's motions filed at ECF 258 and 259 be extended to November 16, 2020; and

IT IS FURTHER ORDERED that the deadline for any reply by Defendant Goldsby or Defendant Tualau be extended to November 23, 2020.

DATED this 13th day of November, 2020.



HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE